1 2 3 4 5	Richard A. Harpootlian, pro hac vice rah@harpootlianlaw.com Phillip Barber, pro hac vice pdb@harpootlianlaw.com RICHARD A. HARPOOTLIAN, PA 1410 Laurel Street Columbia, South Carolina 29201 Telephone: (803) 252-4848 Facsimile: (803) 252-4810		
6 7	Bryan M. Sullivan, State Bar Number 209 bsullivan@earlysullivan.com Zachary C. Hansen, State Bar Number 32 zhansen@earlysullivan.com		
8 9 10	EARLY SULLIVAN WRIGHT GIZER & McRAE LLP 6420 Wilshire Boulevard, 17 <sup>th</sup> Floor Los Angeles, California 90048 Telephone: (323) 301-4660		
11	Facsimile: (323) 301-4676 Attorneys for PLAINTIFF		
12	ROBERT HUNTER BIDEN		
13	UNITED STATES		
14	CENTRAL DISTRIC		RNIA
15	WESTERN	N DIVISION	
16	ROBERT HUNTER BIDEN, an individual,	Case No. 2:23-c	v-09430-SVW-PD
17 18	Plaintiff,	AMENDED JO EXHIBIT LIST	
	VS.	Pretrial Conference:	<b>July 21, 2025</b>
19	PATRICK M. BYRNE, an individual,	Time:	3:00 p.m.
20	Defendant.	Jury Trial	July 29, 2025 9:00 a.m.
21		Time:	9:00 a.m.
22		Judge: Hon. St Ctrm. 10A	ephen V. Wilson,
23		Cum. 10A	
24			
ا م			
25			
26			

Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter Biden ("Plaintiff") and Defendant Patrick Byrne ("Defendant") set forth the following proposed exhibits for trial. Plaintiff and Defendant expressly reserve the right to further amend the Joint Trial Exhibit List to add documents obtained as a result of any additional discovery and as may be necessary for impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

Case Title: Robert Hunter Biden v. Patrick M. Byrne

Case No: 2:23-cv-09430-SVW-PD

	Г	Г	
$\mathbf{Ex.}$	<u>Description</u>	<u>Date</u>	<u>Date</u>
<u>No.</u>		<u>Identified</u>	<b>Admitted</b>
1.	Capitol Times Magazine, Issue 1,		
	published on June 27, 2023 (RHB00001-		
	99)		
2.	Telegram post by Defendant Patrick Byrne		
	on March 20, 2022, including associated		
	comments (RHB00695)		
3.	Telegram post by Defendant Patrick Byrne		
	on April 7, 2022, including associated		
	comments (RHB00696)		
4.	Telegram post by Defendant Patrick Byrne		
	on October 20, 2022 reposting post from		
	Qtime Network, including associated		
	comments (RHB00697)		
5.	Telegram post by Defendant Patrick Byrne		
	on December 12, 2022, including		
	associated comments (RHB00698)		
6.	X post by Defendant Patrick Byrne on		

1	Ex.	<b>Description</b>	<b>Date</b>	<u>Date</u>
2	No.		Identified	Admitted
3		January 5, 2023, including associated		
4		comments (RHB00718)		
5	7.	X post by Defendant Patrick Byrne on		
6		January 7, 2023, including associated		
7		comments (RHB00721)		
8	8.	X post by Defendant Patrick Byrne on		
9		February 10, 2023, including associated		
10		comments (RHB00699)		
11	9.	X post by Defendant Patrick Byrne on		
12		February 12 2023, including associated		
13		comments (RHB00700)		
14	10.	X post by Defendant Patrick Byrne on		
15		February 24, 2023, including associated		
16		comments (RHB00701)		
17	11.	X post by Defendant Patrick Byrne on		
18		March 17, 2023, including associated		
19		comments (RHB00100, RHB00702)		
20	12.	X post by Defendant Patrick Byrne on		
21		March 28, 2023 (RHB00110, 150)		
22	13.	X post by Defendant Patrick Byrne on		
23		April 17, 2023, including associated		
24		comments (RHB00716)		
25	14.	X post by Defendant Patrick Byrne on		
26		May 10, 2023, including associated		
27		comments (RHB00720)		
28				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>	<u>= = = = = = = = = = = = = = = = = = = </u>	<u>Identified</u>	<u>Admitted</u>
3	15.	Screenshot of link to Defendant Patrick		
4		Byrne's May 10, 2023 interview on <i>The</i>		
5		Absolute Truth with Emerald Robinson		
6		(RHB00186)		
7	16.	Screenshot of link to Defendant Patrick		
8		Byrne's May 11, 2023 interview on The		
9		Absolute Truth with Emerald Robinson		
10		(RHB00187)		
11	17.	Transcript of Defendant Patrick Byrne's		
12		May 11, 2023 interview on The Absolute		
13		Truth with Emerald Robinson		
14		(RHB00711-RHB00715)		
15	18.	Certified Transcript of Defendant Patrick		
16		Byrne's May 11, 2023 interview on The		
17		Absolute Truth with Emerald Robinson		
18	19.	X post by Defendant Patrick Byrne on		
19		May 12, 2023, including associated		
20		comments (RHB00101, 104)		
21	20.	X post by Defendant Patrick Byrne on		
22		May 12, 2023, including associated		
23		comments (RHB00102-103, 112-117,		
24		119)		
25	21.	Telegram post by Defendant Patrick Byrne		
26		on June 24, 2023, including associated		
27		comments (RHB00703)		
28				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.	Description	<u> </u>	Admitted
3		V nost by Defendant Datriels Dyma on	<u>Iuchuncu</u>	Admitted
	22.	1 3		
4		June 25, 2023, including associated		
5		comments (RHB00719)		
6	23.	Telegram post by Defendant Patrick Byrne		
7		on June 27, 2023, including associated		
8		comments (RHB00151-152)		
9	24.	Telegram post by Defendant Patrick Byrne		
10		on June 27, 2023, including associated		
11		comments (RHB00153-155)		
12	25.	Telegram post by Defendant Patrick Byrne		
13		on June 28, 2023, including associated		
14		comments (RHB00157)		
15	26.	X post by Defendant Patrick Byrne on		
16		June 29, 2023, including associated		
17		comments (RHB00105-106)		
18	27.	Telegram posts by Defendant Patrick		
19		Byrne on July 4, 2023, including		
20		associated comments (RHB00156)		
21	28.	Telegram post by Defendant Patrick Byrne		
22		on July 5, 2023, including associated		
23		comments (RHB00158-161)		
24	29.	,		
25		on July 6, 2023, including associated		
26		comments (RHB00162)		
27	30.	· · ·		
28		<u> </u>		

1	Ex.	Description	Date	Date
2	No.		<b>Identified</b>	Admitted
3		on July 21, 2023, including associated		
4		comments (RHB00163-164)		
5	31.	Screenshot of link to Defendant Patrick		
6		Byrne's July 21, 2023 interview with Alex		
7		Jones on The Alex Jones Show		
8		(RHB00185)		
9	32.	Transcript of Defendant Patrick Byrne's		
10		July 21, 2023 interview with Alex Jones		
11		on The Alex Jones Show (RHB00722-		
12		RHB00789)		
13	33.	Certified Transcript of Defendant Patrick		
14		Byrne's July 21, 2023 interview with Alex		
15		Jones on The Alex Jones Show		
16	34.	Telegram post by Defendant Patrick Byrne		
17		on July 22, 2023, including associated		
18		comments (RHB00167)		
19	35.	Telegram post by Defendant Patrick Byrne		
20		on July 28, 2023, including associated		
21		comments (RHB00168)		
22	36.	Screenshot of link to Defendant Patrick		
23		Byrne's September 8, 2023 interview on		
24		The Courtenay Turner Podcast, Episode		
25		305: Behind the Testimony of America's		
26		#1 Domestic Extremist w/ Patrick Byrne		
27 28		(RHB00184)		

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	37.	Transcript of Defendant Patrick Byrne's		
4		September 8, 2023 interview on The		
5		Courtenay Turner Podcast, Episode 305:		
6		Behind the Testimony of America's #1		
7		Domestic Extremist w/ Patrick Byrne		
8		(RHB00790-RHB00846)		
9	38.	Certified Transcript of Defendant Patrick		
10		Byrne's September 8, 2023 interview on		
11		The Courtenay Turner Podcast, Episode		
12		305: Behind the Testimony of America's		
13		#1 Domestic Extremist w/ Patrick Byrne		
14	39.	Telegram post by Defendant Patrick Byrne		
15		on September 17, 2023, including		
16		associated comments (RHB00169)		
17	40.	X post by Defendant Patrick Byrne on		
18		October 8, 2023 (RHB00147; Pg. 3 of		
19		Exhibit B to Plaintiff's Complaint)		
20	41.	X post by Defendant Patrick Byrne on		
21		October 8, 2023, including associated		
22		comments (RHB00146; Pg. 2 of Exhibit B		
23		to Plaintiff's Complaint)		
24	42.	X post by Rep. Eric Swalwell on October		
25		8, 2023, including associated comments		
26		(RHB00143-145)		
27	43.	X post by @AzPinkLady on October 11,		
28	<u> </u>			

6 AMENDED JOINT TRIAL EXHIBIT LIST 5801098.1

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>	Description	<u>Identified</u>	Admitted
3	110.	2023, including associated comments	<u>racititica</u>	<u>ramitted</u>
4		(RHB00125-126)		
5	44.	`		
6	44.	2023, including associated comments		
7		(RHB00128)		
8	15	` '		
9	43.	X post by Defendant Patrick Byrne on		
10		October 17, 2023, including associated		
11	16	comments (RHB00141-142)		
12	46.	X post by Defendant Patrick Byrne on		
		October 17, 2023, including associated		
13		comments (RHB00148)		
14	47.	X post by Defendant Patrick Byrne on		
15		October 23, 2023, including associated		
16		comments (RHB00109)		
17	48.	October 26, 2023 Demand for Retraction		
18		Letter to Defendant Patrick Byrne, sent by		
19		Plaintiff's counsel of record (RHB00404-		
20		406)		
21	49.	X post by Defendant Patrick Byrne on		
22		November 9, 2023, including associated		
23		comments (RHB00124, 149)		
24	50.	X post by Defendant Patrick Byrne on		
25		November 9, 2023, including associated		
26		comments (RHB00102-103, 112-117,		
27		119)		
28	<u> </u>			

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	51.	Truth Social post by @RickRichGuillot on		
4		November 9, 2023, including associated		
5		comments (RHB00171)		
6	52.	X post by Defendant Patrick Byrne on		
7		November 10, 2023, including associated		
8		comments (RHB00118, 137)		
9	53.	X post by Defendant Patrick Byrne on		
10		November 13, 2023, including associated		
11		comments (RHB00108, 132)		
12	54.	Screenshot of link to Defendant Patrick		
13		Byrne's November 13, 2023 interview		
14		with Roger Stone on his podcast The		
15		StoneZONE with Roger Stone, titled "Sued		
16		by Hunter Biden Former Overstock CEO		
17		Patrick Byrne Enters the StoneZONE"		
18		(RHB00183)		
19	55.	Transcript of Defendant Patrick Byrne's		
20		November 13, 2023 interview with Roger		
21		Stone on his podcast <i>The StoneZONE with</i>		
22		Roger Stone, titled "Sued by Hunter Biden		
23		Former Overstock CEO Patrick Byrne		
24		Enters the StoneZONE" (RHB00847-		
25		RHB00864)		
26	56.	Certified Transcript of Defendant Patrick		
27		Byrne's November 13, 2023 interview		
28	<u> </u>			

1	Ex.	<b>Description</b>	Date	<u>Date</u>
2	No.		Identified	Admitted
3		with Roger Stone on his podcast The		
4		StoneZONE with Roger Stone, titled "Sued		
5		by Hunter Biden Former Overstock CEO		
6		Patrick Byrne Enters the StoneZONE"		
7	57.	X post by @AzPinkLady on November		
8		14, 2023, including associated comments		
9		(RHB00129-131)		
10	58.	Telegram post by Defendant Patrick Byrne		
11		on December 5, 2023, including		
12		associated comments (RHB00166)		
13	59.	Transcript from George Berges' January 9,		
14		2024 Congressional Transcribed Interview		
15		with the House Committee on Oversight		
16		and Accountability and House Committee		
17		on the Judiciary (RHB00266-403)		
18	60.	January 9, 2024 Letter to Rep James		
19		Comer, Chairman of the House Committee		
20		on Oversight and Accountability, and Rep.		
21		Jim Jordan, Chairman of the House		
22		Committee on the Judiciary, from William		
23		Pittard, counsel for George Berges		
24		(RHB00407-410)		
25	61.	X post by @AzPinkLady on January 11,		
26		2024 (RHB00134)		
27	62.	X post by @AzPinkLady on January 11,		
28	<del>'</del>	·		

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		2024 (RHB00135)		
4	63.	X post by Senator mark Kelly on January		
5		11, 2024, including associated comments		
6		(RHB00136)		
7	64.	Telegram post by Scott Adams on		
8		February 4, 2024, including associated		
9		comments (RHB00165)		
10	65.	Truth Social post by Defendant Patrick		
11		Byrne on February 13, 2024, including		
12		associated comments (RHB00170)		
13	66.	Truth Social post by Defendant Patrick		
14		Byrne on February 22, 2024, including		
15		associated comments (RHB00172)		
16	67.	Text Thread between Defendant Patrick		
17		Byrne and Anil Anwar between March 16,		
18		2024 to April 16, 2024 (Byrne_0000021)		
19	68.	April 1, 2024 Affidavit of John Moynihan		
20		(Byrne_000001-3)		
21	69.	X post by Defendant Patrick Byrne on		
22		April 8, 2024, including associated		
23		comments (RHB00717)		
24	70.	X post by Defendant Patrick Byrne on		
25		April 25, 2024 (RHB00107)		
26	71.	X post by @AzPinkLady on April 25,		
27		2024, including associated comments		
28	L			

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>		<b>Identified</b>	<b>Admitted</b>
3		(RHB00127)		
4	72.	Telegram post by Defendant Patrick Byrne		
5		on June 5, 2024, including associated		
6		comments (RHB00704)		
7	73.	X post by @AzPinkLady on June 30, 2024		
8		(RHB00133)		
9	74.	X post by Defendant Patrick Byrne on July		
10		22, 2024, including associated comments		
11		(RHB00138-140)		
12	75.	August 9, 2024, Defendant Patrick		
13		Byrne's verified Further Responses to		
14		Plaintiff's Interrogatories, Set One		
15	76.	September 5, 2024, Defendant Patrick		
16		Byrne's Responses to Plaintiff's		
17		Interrogatories, Set Two		
18	77.	September 5, 2024, Defendant Patrick		
19		Byrne's Responses to Plaintiff's		
20		Interrogatories, Set Three		
21	78.	September 9, 2024, emails between		
22		Plaintiff's counsel of record and Jared		
23		Roberts, attorney for Ret. Lt. Gen. Michael		
24		Flynn (RHB00506-508)		
25	79.	September 17, 2024, Defendant Patrick		
26		Byrne's Further Responses to Plaintiff's		
27		Requests for Production of Documents,		
28	-	·		

11

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>	<u>B eser i peron</u>	<u>Identified</u>	Admitted
3	100	Set One		1 10011110000
4	80.			
5		Byrne's verified Further Responses to		
6		Plaintiff's Requests for Admissions, Set		
7		One		
8	81.	September 19, 2024, Defendant Patrick		
9		Byrne's Further Responses to Plaintiff's		
10		Requests Admissions, Set Two		
11	82.	,		
12		Times Media LLC from Plaintiff's counsel		
13		of record (RHB00445-505)		
14	83.			
15		on October 7, 2024, including associated		
16		comments (RHB00705)		
17	84.	October 10, 2024, Defendant Patrick		
18		Byrne's Further Responses to Plaintiff's		
19		Requests for Production of Documents,		
20		Set Three		
21	85.	October 10, 2024, Defendant Patrick		
22		Byrne's Further Responses to Plaintiff's		
23		Requests for Production of Documents,		
24		Set Four		
25	86.	X post by Defendant Patrick Byrne on		
26		October 26, 2024, including associated		
27		comments (RHB00706)		
28				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<u>Identified</u>	Admitted
3	87.	October 29, 2024 Screenshot of Defendant		
4		Patrick Byrne's X Profile (RHB00707)		
5	88.	October 29, 2024 Screenshot of website		
6		enemywithindocuseries.com (RHB00708)		
7	89.	October 29, 2024 Screenshot of Defendant		
8		Patrick Byrne's book, The Deep Rig: How		
9		Election Fraud Cost Donald J. Trump the		
10		White House, By a Man Who did not Vote		
11		for Him: (or what to send friends who ask		
12		"Why do you doubt the integrity of		
13		Election 2020", for sale on Amazon.com		
14		(RHB00710)		
15	90.	October 29, 2024 Screenshot of Defendant		
16		Patrick Byrne's book, Danger Close:		
17		Domestic Extremist #1 Comes Clean, for		
18		sale on Amazon.com (RHB00709)		
19	91.	Defendant Patrick Byrne's book,		
20		including audio version, Danger Close:		
21		Domestic Extremist #1 Comes Clean,		
22		published on February 15, 2024		
23		(RHB00509-RHB00694)		
24	92.	Truth Social post by @TXFreedom4Ever		
25		in 2023 (exact date unknown), including		
26		associated comments (RHB00173)		
27	93.	Truth Social post by @DEFCONMarine		
28	L	<u> </u>		

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<u>Admitted</u>
3		in 2023 (exact date unknown), including		
4		associated comments (RHB00178)		
5	94.	Truth Social post by @RealRogerStone in		
6		2023 (exact date unknown), including		
7		associated comments (RHB00179)		
8	95.	Truth Social post by @AgnesBenko in		
9		2023 (exact date unknown), including		
10		associated comments (RHB00180)		
11	96.	Truth Social post by @cziggy218 in 2023		
12		(exact date unknown), including		
13		associated comments (RHB00181)		
14	97.	Truth Social post by @nancydunks in		
15		2023 (exact date unknown), including		
16		associated comments (RHB00182)		
17	98.	Truth Social post by Defendant Patrick		
18		Byrne in 2024 (exact date unknown),		
19		including associated comments		
20		(RHB00174)		
21	99.	Truth Social post by Defendant Patrick		
22		Byrne in 2024 (exact date unknown),		
23		including associated comments		
24		(RHB00176)		
25	100	Truth Social post by Defendant Patrick		
26		Byrne in 2024 (exact date unknown),		
27		including associated comments		
28	l			

1	TC	Description	Data	Data
	<u>Ex.</u>	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	<u>No.</u>		<u>Identified</u>	<u>Admitted</u>
3		(RHB00170)		
4	101	Truth Social post by Defendant Patrick		
5		Byrne in 2024 (exact date unknown),		
6		including associated comments		
7		(RHB00175)		
8	102	Remittance Advance Invoice from Simon		
9		& Schuster UK Ltd., dated September 4,		
10		2021 (RHB00411)		
11	103	Royalty Statements from Simon &		
12		Schuster from March 2020 through		
13		September 2024 (RHB00412-443)		
14	104	Royalty Ledger from Book/Lab Literary		
15		Agency (date unknown) (RHB00444)		
16	105	Hunter Biden Beautiful Things Press Kit		
17		(RHB00189-265)		
18	106	Audio Recording produced by Defendant		
19		in Discovery on August 27, 2024 titled		
20		"HIGHLY CONFIDENTIAL – AUDIO-		
21		2021-08-15-10-07-25"		
22	107	Certified Transcript of Audio Recording		
23		produced by Defendant in Discovery on		
24		August 27, 2024 titled "HIGHLY		
25		CONFIDENTIAL – AUDIO-2021-08-15-		
26		10-07-25" (RHB01413-1414)		
27	108	Audio Recording produced by Defendant		
28	<del> </del>			

1	Ex.	<u>Description</u>	<b>Date</b>	<b>Date</b>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		in Discovery on August 27, 2024 titled		
4		"HIGHLY CONFIDENTIAL – AUDIO-		
5		2021-08-24-08-46-17"		
6	109	Certified Transcript of Audio Recording		
7		produced by Defendant in Discovery on		
8		August 27, 2024 titled "HIGHLY		
9		CONFIDENTIAL – AUDIO-2021-08-24-		
10		08-46-17" (RHB01415-1416)		
11	110	Audio Recording produced by Defendant		
12		in Discovery on August 27, 2024 titled		
13		"HIGHLY CONFIDENTIAL – AUDIO-		
14		2021-08-24-14-43-38"		
15	111	Certified Transcript of Audio Recording		
16		produced by Defendant in Discovery on		
17		August 27, 2024 titled "HIGHLY		
18		CONFIDENTIAL – AUDIO-2021-08-24-		
19		14-43-38" (RHB01417-1418)		
20	112	Defendant's passport photographs		
21		produced by Defendant in discovery on		
22		November 4, 2024 (Byrne_0000024-		
23		Byrne_0000045)		
24	113	Defendant's "medical notes" provided by		
25		Defendant via email on November 4, 2024		
26	114	Defendant's American Express recorded		
27		from July 2023, produced by Defendant in		
28				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<u>Admitted</u>
3		discovery on January 17, 2025 as		
4		(Byrne_0000046-Byrne_0000047)		
5	115	Defendant Patrick Byrne's responses to		
6		Rule 26 Initial Disclosures,		
7	116	Defendant Patrick Byrne's responses to		
8		Special Interrogatories		
9	117	Certified copy of the Order After Trial,		
10		Nazerali v. Mitchell, et al. No. S-116979		
11	118	Certified copy of Reasons for Judgment,		
12		Nazerali v. Mitchell, et al. No. S-116979		
13	119	IRS Amended 990 Form for The American		
14		Project for 2021		
15	120	IRS 990 Form for The American Project		
16		for 2021		
17	121	IRS 990 Form for The American Project		
18		for 2022		
19	122	US Securities and Exchange Commission		
20		Form 4 for Overstock.com, Inc.,		
21		9/18/2019		
22	123	X post by Defendant Patrick Byrne on		
23		January 10, re Com Glover and January 6		
24		crowd		
25	124	Substack post by Defendant Patrick Byrne		
26		on January 10, re Comm. Glover and		
27		January 6 crowd		
28		<u> </u>		

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<u> </u>	Admitted
3		X post by Defendant Patrick Byrne on		
4		January 15 re we are undefeated		
5	126	X post by Defendant Patrick Byrne on		
6		January 22 re greatest patriots of our time		
7	127	X post by Defendant Patrick Byrne on		
8		January 25 re January 6		
9	128	X post by Defendant Patrick Byrne on		
10		January 28 re 2020 election		
11	129	X repost by Defendant Patrick Byrne on		
12		February 5 re government		
13	130	X post by Defendant Patrick Byrne on		
14		March 11 re rigging of Election 2020		
15	131	X repost of Jake Lang's January Political		
16		Prisoner post by Defendant Patrick Byrne		
17	132	"The Enemy Within" Docuseries by		
18		Patrick Byrne (2024).		
19	133	"The Deep Rig" Documentary by Patrick		
20		Byrne (2021).		
21	134	US Dominion, Inc., Dominion Voting		
22		Systems, Inc. and Dominion Voting		
23		Systems Corporation v. Patrick Byrne		
24		Complaint Civil Action No. 1:21-cv		
25		02131		
26	135	US Dominion, Inc., Dominion Voting		
27 28		Systems, Inc. and Dominion Voting		

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<u>Admitted</u>
3		Systems Corporation v. Patrick Byrne		
4		Notice of Appeal Civil Action No. 1:21-		
5		cv02131		
6	600.	Defendant Patrick Byrne's Notice of		
7		Taking of Deposition of Plaintiff Robert		
8		Hunter Biden (Deposition of Robert		
9		Hunter Biden taken on 08/16/2024)		
10	601.	Plaintiff's Objections to Defendant's		
11		Amended Notice of Deposition of Plaintiff		
12		Robert Hunter Biden (Deposition of		
13		Robert Hunter Biden taken on 08/16/2024)		
14	602.	Plaintiff Robert Hunter Biden's Rule 26		
15		Supplemental Disclosures (Deposition of		
16		Robert Hunter Biden taken on		
17		08/16/2024)		
18	603.	Plaintiff Robert Hunter Biden's		
19		Responses to Defendant Patrick M.		
20		Byrne's First Set of Interrogatories		
21		(Deposition of Robert Hunter Biden taken		
22		on 08/16/2024)		
23	604.	Stipulation for Protective Order and		
24		Order (Deposition of Robert Hunter		
25		Biden taken on 08/16/2024)		
26		]		

28 EARLY
SULLIVAN
WRIGHT
GIZER &
MCRAE LLP
ATTORNEYS AT LAW

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<u>Admitted</u>
3	605.	Complaint for Damages for Defamation		
4		(Deposition of Robert Hunter Biden taken		
5		on 08/16/2024)		
6	606.	Affidavit dated April 1, 2024 (Deposition		
7		of Robert Hunter Biden taken on		
8		08/16/2024)		
9	607.	U.S. Senate Committee on Finance		
10		Majority Staff Report (Deposition of		
11		Robert Hunter Biden taken on		
12		08/16/2024)		
13	608.	The Government's Motions In Limine		
14		(Deposition of Robert Hunter Biden taken		
15		on 08/16/2024)		
16	609.	New York Post article entitled Smoking-		
17		gun email reveals how Hunter Biden		
18		introduced Ukrainian businessman to VP		
19		dad (Deposition of Robert Hunter Biden		
20		taken on 08/16/2024)		
21	610.	Independent article entitled Not many		
22		people are buying Hunter Biden's new		
23		book (Deposition of Robert Hunter Biden		
24		taken on 08/16/2024)		
25	611.	New York Post article entitled Hunter		
26		Biden's drug- and sex-fueled memoir is a		
27		<u> </u>		

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	<u> </u>	<u>Identified</u>	Admitted
3		big fat flop (Deposition of Robert Hunter		
4		Biden taken on 08/16/2024)		
5	612.	Screenshot of an Amazon page for the		
6		book Laptop from Hell: Hunter Biden,		
7		Big Tech, and the Dirty Secrets the		
8		President Tried to Hide (Deposition of		
9		Robert Hunter Biden taken on		
10		08/16/2024)		
11	613.	National Security article entitled Analysis		
12		of Hunter Biden's hard drive show he, his		
13		firm took in about \$11 million from 2013		
14		to 2018, spent it fast (Deposition of		
15		Robert Hunter Biden taken on		
16		08/16/2024)		
17	614.	Article entitled The Sordid Saga of		
18		Hunter Biden's Laptop (Deposition of		
19		Robert Hunter Biden taken on		
20		08/16/2024)		
21	615.	Article entitled Republican Claims About		
22		Hunter Biden Offenses (Deposition of		
23		Robert Hunter Biden taken on		
24		08/16/2024)		
25	616.	The Irish Times article entitled Hunter		
26		Biden, the 'big guy' and whether		
27		allegations of corruption represent a		
28				

1	Ex.	Description	<u>Date</u>	Date
2	No.		<u>Identified</u>	Admitted
3		scandal or a smear (Deposition of Robert		
4		Hunter Biden taken on 08/16/2024)		
5	617.	CBC News article entitled The scandals		
6		swirling around Hunter Biden - what we		
7		know, what we don't, and what's next		
8		(Deposition of Robert Hunter Biden taken		
9		on 08/16/2024)		
10	618.	Press Release entitled Comer, Greene		
11		Renew Request to DOJ on Mishandling		
12		of Hunter Biden Victims' Rights		
13		(Deposition of Robert Hunter Biden taken		
14		on 08/16/2024)		
15	619.	Article entitled Hunter Biden's universe		
16		of legal problems, briefly explained		
17		(Deposition of Robert Hunter Biden taken		
18		on 08/16/2024)		
19	620.	Indictment for Case No. 23-00061-MN		
20		(Deposition of Robert Hunter Biden taken		
21		on 08/16/2024)		
22	621.	New York Post article entitled Biden has		
23		a secret, illegal deal with Iran that gives		
24		mullahs everything they want (Deposition		
25		of Robert Hunter Biden taken on		
26		08/16/2024)		
27	-			

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	622.	Fox News article entitled Hunter Biden		
4		took thousands from daughter's college		
5		fund for 'hookers and drugs': report		
6		(Deposition of Robert Hunter Biden taken		
7		on 08/16/2024)		
8	623.	Indictment for Case No. 2:23-cr-00599-		
9		MCS (Deposition of Robert Hunter Biden		
10		taken on 08/16/2024)		
11	624.	National Review article entitled The		
12		Indefensible, Shameless, Sordid Hunter		
13		Biden (Deposition of Robert Hunter		
14		Biden taken on 08/16/2024)		
15	625.	CNN Politics article entitled Hunter		
16		Biden's universe of legal problems,		
17		briefly explained (Deposition of Robert		
18		Hunter Biden taken on 08/16/2024)		
19	626.	The New York Times article entitled A		
20		Timeline of Hunter Biden's Life and		
21		Legal Troubles (Deposition of Robert		
22		Hunter Biden taken on 08/16/2024)		
23	627.	Marco Polo file BidenLaptopMedia.com		
24		(Deposition of Robert Hunter Biden taken		
25		on 08/16/2024)		
26				

27

1	Ex.	Description	Date	Date
2	No.		<u> </u>	Admitted
3	628.	Marco Polo Report on the Biden Laptop		
4		(Deposition of Robert Hunter Biden taken		
5		on 08/16/2024)		
6	629.	Defendant's Document Production		
7		(Byrne_000001-Byrne_000009) served		
8		on 08/27/2024		
9	630.	Defendant's Document Production		
10		(Byrne_000010-Byrne_000020) served		
11		on 10/15/2024		
12	631.	Defendant's Document Production		
13		(Byrne_000021) served on 10/15/2024		
14	632.	Defendant's Document Production		
15		(Byrne_000022-Byrne_000023) served		
16		on 10/16/2024		
17	633	Passport Pages for Byrne (Byrne 24 to		
18		25)		
19	634	Tapes 2021		
20				
21	635	Affidavit of Moynihan (Byrne 1-3)		
22				
23	635	Byrne Amex Travel Documents (Byrne		
24		10-20)		
25	636	Assistant Secretary of State Letter		
26		8/26/11 (Byrne 4)		
27	637	Airline Itinerary Documents (Byrne 7-9)		
28		<u>l</u>		

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<u>Admitted</u>
3				
4	638	Complaint in Biden v. Ziegler Case No.:		
5		2.23-cv-07591 (Rule 26f Disc 9/30/24)		
6	639	Complaint in Biden v. Giuliana Case No.:		
7		2.23-cv-8032 (Rule 26f Disc 9/30/24		
8	640	Complaint Issac v. Biden Case No.:		
9		822C-10-012-CAK (Rule 26f Disc		
10		9/30/24)		
11	641	US Senate Report on Corruption (Exh		
12		620 Biden Deposition) Rule 26f Disc		
13		9/30/24		
14	642	Motions in Limine Patrick Ho Case (Exh		
15		621 Biden Deposition) Rule 26f Discl		
16		9/30/24		
17	643	Book Laptop from Hell by Miranda		
18		Devine; Rule 26f Discl 9/30/24		
19	644	Gun Case Indictment- Exh 633 to Biden		
20		Deposition; Rule 26f Disc 9/30/24		
21	645	Tax Case Indictment -Exh 638 to Biden		
22		Deposition; Rule 26f Disc 9/30/24		
23	646	Jury Verdict Gun Case; Rule 26f Discl		
24		9/3024		
25	647	Dr. Nathan E. Lavin MD Report dated		
26		October 29, 2024, produced to plaintiff's		
27				

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3		counsel per stipulation and order for IME;		
4		Rule 26f Discl 9/30/24		
5	648	Report on The Biden Laptop published by		
6		Marco Polo; Rule 26f Discl 9/30/24		
7	649	Patrick Ho Sanction; Rule 26f Discl		
8		9/30/24		
9	650	Article: Hunter Biden took Daughter's		
10		College Money-Exh 635 to Biden		
11		Deposition; Rule 26f Discl 9/30/24		
12	651	Article on Hunter Biden's Lawsuit; Rule		
13		26f Disc 9/30/24		
14	652	Article on Hunter Biden Art Sales; Rule		
15		26f Discl dated 9/30/24		
16	653	Press Kit-Exh 609 to Deposition of		
17		Biden; Rule 26f Discl 9/30/24		
18	654	Press Kit-Exh 610 to Biden Deposition;		
19		Rule 26f Discl 9/3024		
20	655	Podcasts-Exh 611 to Biden Deposition;		
21		Rule 26f Discl 9/30/24		
22	656	International Press-Exh 612 to Biden		
23		Deposition; Rule 26f Discl 9/30/24		
24	657	NY Post Article on Burisma; Exh 622 to		
25		Biden Deposition; Rule 26f Discl 9/30/24		
26	658	Article on Biden's book sales; Exh 623 to		
27		Biden Deposition; Rule 26f Discl 9/30/24		
28	<u> </u>			

1	Ex.	<b>Description</b>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	659	Article on Biden's Book; Exh 624 Biden		
4		Deposition; Rule 26f Discl 9/30/24		
5	660	Laptop from Hell Screen Shot; Exh 625		
6		to Biden Deposition; Rule 26f Discl		
7		9/30/24		
8	661	Analysis of Biden laptop and payments;		
9		Exh 626 to Biden Deposition; Rule 26f		
10		Discl 9/30/24		
11	662	Biden Laptop Article, Exh. 627 to Biden		
12		Deposition; Rule 26f Discl. 9/30/24		
13	663	Scandal Article; Exh 629 to Biden		
14		Deposition; Rule 26f Dlscl 9/30/24		
15	664	Scandal Article; Exh 630 to Biden		
16		Deposition; Rule 26f Discl 9/30/24		
17	665	Article on Biden's Legal Problems; Exh		
18		632 to Biden Deposition; Rule 26f		
19		Disclosure		
20	666	Article on Shameless Biden; Exh. 639 to		
21		Biden Deposition; Rule 26f Discl 9/30/24		
22	667	Article on Biden Legal Problems; Exh.		
23		640 to Biden Deposition; Rule 26f Discl		
24		9/30/24		
25	668	Marco Polo Pub on Biden File; Rule 26		
26		Discl 9/30/24		
27		1		

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		<b>Identified</b>	<b>Admitted</b>
3	669	Marco Polo Report on Biden; Exh 654 to		
4		Biden Deposition; Rule 26f Discl 9/30/24		
5	670	Article on Biden Law License		
6		Suspended; Rule 26f Discl 9/30/24		
7	671	Article on Romanian Influence Peddling		
8		by Biden; Rule 26f Discl 9/30/24		
9				

The Parties reserve the right to request that the court permit the List of Exhibits to be amended to allow for additional exhibits to be included in the list pursuant to Federal Rule of Civil Procedure Section 16(e). The Parties also reserve pursuant to the right to pursuant to Federal Rule of Civil Procedure 16-2.3 to use impeachment exhibits that are not included on the Joint Exhibit List during the trial of this case. The parties have not stipulated to the authenticity or admissibility of these trial exhibits as of the filing of this Joint Exhibit List.

Dated: July 16, 2025 EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

By: /s/ Zachary C. Hansen

BRYAN M. SULLIVAN (State Bar No. 209743) bsullivan@earlysullivan.com ZACHARY C. HANSEN (State Bar No.

zhansen@earlysullivan.com EARLY SULLIVAN WRIGHT GIZER

& McRAE LLP

6420 Wilshire Boulevard, 17th Fl. Los Angeles, California 90048 Telephone: (323) 301-4660

Facsimile: (323) 301-4676

27 28 EARLY SULLIVAN **N**RIGHT MCRAE LLP

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

Case 2	:23-cv-09430-SVW-PD	Document 263 Filed 07/16/25 Page 30 of 30 Page ID #:6799
1		Richard A. Harpootlian, pro hac vice
2		rah@harpootlianlaw.com Phillip Barber, pro hac vice
3		Richard A. Harpootlian, pro hac vice rah@harpootlianlaw.com Phillip Barber, pro hac vice pdb@harpootlianlaw.com RICHARD A. HARPOOTLIAN, PA
4		1410 Laurei Street
5		Columbia, South Carolina 29201 Telephone: (803) 252-4848 Facsimile: (803) 252-4810
6		Attorneys for Plaintiff Robert Hunter Biden
7		Robert Hunter Biden
8	Dated: July 16, 2025	LAW OFFICES OF MICHAEL C. MURPHY
10		
10		
12		By: /s/ Michael C. Murphy Michael C. Murphy, Esq.
13		Michael C. Murphy, Jr., Esq.
14		Attorneys for Defendant
15		Patrick Byrne
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28 RLY		
LIVAN IGHT ER &	5801098.1	29